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INDEPENDENT REGULATORY REVIEW COMMISSION

2-7-07

Mary Bender
The Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street, Room 102
Harrisburg, PA 17110-9408

Dear Ms. Bender:

This letter is a response to the public comment period for Proposed Regulation to Dog Law. I appreciate the chance to express some concerns.

Pet stores are exempt from kennel space and exercise requirements presumably because dogs are expected to be in pet stores for a limited period of time. Shelters and breed rescue organizations should be exempt from these requirements for the same reasons and this should be explicitly stated in the dog law.

Requiring foster homes operating under a licensed shelter to obtain individual kennel licenses runs counter to the stated objective of having dogs adopted rather than euthanized. Fostering just two litters of puppies a year could result in being over the 26 dog limit. Adding to the financial and paperwork burdens of fostering will discourage people from fostering and result in more euthanasia. Foster homes should be registered with the licensed organization and perhaps subject to inspection but not be required to get kennel licenses.

Documentation of veterinary care is required for sick or injured dogs. It should also be required that dogs be examined by a veterinarian prior to being bred and that the results of this exam be kept as part of the dogs record. This addresses the welfare of the dogs but also that of the public. A complete (and hopefully honest) physical exam would bring to light many of the hereditary problems perpetuated by unscrupulous breeders.

Thank you for your consideration.

Sincerely,

Christine M. Rusals DVM Christine M. Runnels, DVM